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8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10	UNITED STATES OF AMERICA,	
11	Plaintiff,	
12	v.)	2:09-CV-1647-LRH (LRL)
13	\$49,205.27 IN UNITED STATES CURRENCY	
14	Defendant.	
15	UNITED STATES' UNOPPOSED MOTION TO CONTINUE THE DATE TO FILE ITS COMPLAINT FOR FORFEITURE <i>IN</i>	
16		
17	(CELLEL ALC	Aquest)
18	The United States of America ("United States"), by and through Daniel G. Bogden, United	
19	States Attorney, and Michael A. Humphreys, Assistant United States Attorney, respectfully applies	
20	for an extension of time until and including April 27, 2011 pursuant to 18 U.S.C. § 983(a)(3)(A), for	
21	the United States to file a Civil Complaint for Forfeiture In Rem against the \$49,205.27 in United	
22	States Currency. The Government's Complaint is currently due December 28, 2010.	
23	Gregg Gariti and numerous associates of his have been the focus of a historical state/federa	
24	criminal investigation into their activities of alleged unlawful gaming activities in Nevada and	
25	elsewhere. Generally speaking, the Government has developed information that Gariti and other	
26	were operating an illegal book-making operation	from approximately December 2008 through

1 approximately April 2009, all in violation of 18 U.S.C. § 1084 and other federal anti-gambling 2 statutes. A principal situs of that illegal operation was Las Vegas, Nevada. 3 Pursuant to plea negotiations between Mr. Gariti and the Government, on September 24, 4 2009, Mr. Gariti entered a change of plea before this Court. 5 In the meantime, the Government has a deadline, under the strictures of 18 U.S.C. § 983 6 (a)(3)(A), to file its forfeiture complaint, regarding the above-captioned currency, no later than 7 December 28, 2010. 8 The criminal case will not be disposed of by the time the Government is required to file its 9 complaint. However, counsel for the United States believes that there will be a final disposition of 10 this matter before the expiration of the time period for the continuance requested herein; making 11 further requests for continuances unnecessary. 12 Finally, on December 27, 2010, defendant's counsel, Margaret Stanish, agreed to the 13 extension of time and authorized counsel for the United States to file this Unopposed Motion with this 14 Court. Because the parties have agreed to the extension of time to file a Civil Complaint For 15 Forfeiture In Rem and to facilitate a final universal plea/sentencing disposition, this Court should 16 extend the time. 17 This motion is not submitted solely for the purpose of delay or for any other improper 18 purpose. 19 20 21 22 23 24

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WHEREFORE, the United States moves this Court to grant its motion to extend the time for the United States to file its civil complaint in the above-captioned matter for an additional 120 days, or until April 27, 2011. DATED this 27^h day of December, 2010. Respectfully submitted, DANIEL G. BOGDEN **United States Attorney** /s/Michael A. Humphreys MICHAEL A. HUMPHREYS Assistant United States Attorney IT IS SO ORDERED: DATED this 15th day of January, 2011 LARRY R. HICKS UNITED STATES DISTRICT JUDGE